

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
MARGARET TANSLEY,)
Defendant.)

Criminal Action No. 05-56

INFORMATION

The United States Attorney for the District of Delaware charges that:

COUNT ONE

On or about February 27, 2002, in the District of Delaware, Margaret Tansley, defendant herein, knowingly and willfully executed and attempted to execute a scheme and artifice to obtain, by means of false or fraudulent pretenses, representations, and promises, any of the money and property owned by, or under the custody and control of, the Delaware Medical Assistance Program ("DMAP"), a health care benefits program, in connection with the delivery of and payment for health care benefits, items, and services, to wit, submitting a claim for payment to the DMAP on behalf of Reliable Medical Transportation ("Reliable") for transporting G.M. to Brandywine Counseling, Inc., on February 27, 2002, when, in fact, Reliable had not transported G.M. on February 27, 2002, and defendant well knew that the billing system she used would and did generate and submit a claim to the DMAP for transporting G.M. on February 27, 2002 whether or not Reliable provided such transportation, in violation of Title 18, United States Code, Sections 1347 and 2.

COLM F. CONNOLLY
UNITED STATES ATTORNEY



Leonard P. Stark
Assistant United States Attorney

Dated: